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VIA HAND DELIVERY

The Honorable Sam A. Lindsay United States District Court for the Northern District of Texas 1100 Commerce St., Room 1544 Dallas, Texas 75242-1003



Re: Albert G. Hill, III and Erin Nance Hill v. Lyda Hill, et al., Civil Action No. 3:20-CV-03634

Dear Judge Lindsay:

I write to you regarding the Motion to Dismiss we filed on behalf of Ms. Lyda Hill in the above-referenced matter on March 3, 2021 (in addition to the Reply we filed on April 26, 2021). The Motion to Dismiss is now fully briefed. As outlined in our Reply, we include a specific request for sanctions – a request we do not take lightly, but one we believe is warranted by what we believe to be the repetitively abusive lawsuits initiated by the Plaintiffs. Given the number of filings the Court has reviewed in the underlying *Hill* litigation, I know the Court is intimately familiar with the relevant proceedings and facts; however, if a telephonic, video, or in-person conference might assist the Court, we would welcome the opportunity to participate, answer any questions, and address any outstanding issues.

Respectfully,

Thomas M. Melsheimer (Counsel for Lyda Hill)

CC: Grant K. Schmidt (Co-Counsel)

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William Skepnek (Counsel for Plaintiffs)

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